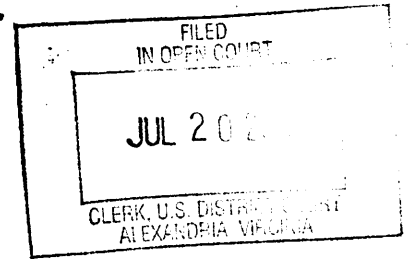


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

CARL SARA,

a/k/a CARL MARTIN SARA

Defendant.

Criminal No. 1:17-cr-54

Count 1: 18 U.S.C. §§ 1591, 1594, & 1596
Attempted Sex Trafficking of Children

Count 2: 18 U.S.C. § 2422(b)
Attempted Coercion & Enticement of a
Minor

Count 3: 18 U.S.C. § 2423(b)
Travel with Intent to Engage in Illicit
Sexual Conduct

Count 4: 18 U.S.C. § 2252(a)(1)
Transportation of Child Pornography

Count 5: 18 U.S.C. § 2252(a)(4)(B)
Possession of Child Pornography

Count 6: 18 U.S.C. § 1594(c)
Conspiracy to Commit Sex Trafficking

Count 7: 18 U.S.C. §§ 1591 & 1596
Sex Trafficking of Children

Forfeiture Notice:
18 U.S.C. §§ 1594 & 2253

Honorable Anthony J. Trenga

SUPERSEDING INDICTMENT

July 2017 Term – at Alexandria, Virginia

THE GRAND JURY CHARGES THAT:

COUNT 1

(Attempted Sex Trafficking of Children)

Between in or about May 2013 and in or about August 2013, in the Eastern District of Virginia and elsewhere, the defendant, CARL SARA, a national of the United States, did attempt to knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, and maintain, by any means a person, knowing, and in reckless disregard of the fact, and with reasonable opportunity to observe the person attempted to be recruited, enticed, harbored, transported, provided, obtained, and maintained, that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act; in particular, a person who had not attained the age of 14 years ("Minor A").

(In violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1), 1594(a) and 1596(a)(1)).

THE GRAND JURY FURTHER CHARGES THAT:

COUNT 2

(Attempted Coercion & Enticement of a Minor)

Between in or about May 2013 and in or about August 2013, in the Eastern District of Virginia and elsewhere, the defendant, CARL SARA, using the mail and any facility and means of interstate and foreign commerce, did attempt to knowingly persuade, induce, entice and coerce an individual who has not attained the age of 18 years to engage in sexual activity for which any person can be charged with a criminal offense, namely engaging in illicit sexual conduct in a foreign place, in violation of Title 18, United States Code, Section 2423(c).

(In violation of Title 18, United States Code, Section 2422(b)).

THE GRAND JURY FURTHER CHARGES THAT:

COUNT 3

(Travel with Intent to Engage in Illicit Sexual Conduct)

On or about July 31, 2013, in the Eastern District of Virginia, and elsewhere, the defendant, CARL SARA, a United States citizen, traveled in interstate and foreign commerce, from the Eastern District of Virginia to the Philippines, for the purpose of engaging in illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with another person under 18 years of age.

(In violation of Title 18, United States Code, Section 2423(b)).

THE GRAND JURY FURTHER CHARGES THAT:

COUNT 4

(Transportation of Child Pornography)

In or about September 2014, in the Eastern District of Virginia, and elsewhere, the defendant, CARL SARA, did knowingly transport and ship using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer and mails, any visual depiction of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256; to wit: videos and still images of minors engaged in sexually explicit conduct initially received in or about 2013 via the “carl_in_dc@yahoo.com” Yahoo email account.

(In violation of Title 18, United States Code, Section 2252(a)(1)).

THE GRAND JURY FURTHER CHARGES THAT:

COUNT 5
(Possession of Child Pornography)

On or about January 28, 2016, in Fairfax County, Virginia, within the Eastern District of Virginia, the defendant, CARL SARA, did knowingly possess any visual depiction of a minor engaging in sexually explicit conduct that has been transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which was produced using any materials which have been mailed and so shipped and transported, by any means including by computer; to wit: videos and still images, other than those videos and still images named in Count 4 of this Indictment, depicting minor and prepubescent children engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256, including but not limited to actual and simulated intercourse, masturbation, and the lascivious exhibition of the genitals and pubic area.

(In violation of Title 18, United States Code, Section 2252(a)(4)(B)).

THE GRAND JURY FURTHER CHARGES THAT:

COUNT 6

(Conspiracy to Commit Sex Trafficking of Minors)

Beginning in or about 2012 and continuing to in or about September 2013, in the Eastern District of Virginia and elsewhere, the defendant, CARL SARA, a national of the United States, and another known to the Grand Jury, conspired and agreed with each other to knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, and maintain, by any means a person, knowing, and in reckless disregard of the fact, and with reasonable opportunity to observe the person so recruited, enticed, harbored, transported, provided, obtained, and maintained, that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act.

(In violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1594(c) and 1596(a)(1)).

THE GRAND JURY FURTHER CHARGES THAT:

COUNT 7
(Sex Trafficking of a Minor)

Between in or about May 2013 and in or about August 2013, in the Eastern District of Virginia and elsewhere, the defendant, CARL SARA, a national of the United States, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, and maintain, by any means a person, knowing, and in reckless disregard of the fact, and with reasonable opportunity to observe the person so recruited, enticed, harbored, transported, provided, obtained, and maintained, that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act; in particular, a person who had attained the age of 14 years but had not attained the age of 18 years ("Minor B").

(In violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), and 1596(a)(1)).

FORFEITURE NOTICE

The allegations of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging criminal forfeiture to the United States of America of certain property in which the defendant, CARL SARA, has an interest.

Pursuant to Title 18, United States Code, Sections 1594 and 2253, upon a conviction for violating any of Title 18, United States Code, Sections 1591, 1594, 1596, or 2252, as applicable, the defendant, CARL SARA, shall forfeit to the United States any and all matters which contain any visual depiction of minors engaged in sexually explicit conduct in violation of the charged offenses; and/or any property, real or personal, constituting or traceable to any proceeds the defendant obtained directly or indirectly as a result of the above violations; and any and all property used, or intended to be used, to commit and to promote the commission of the aforementioned violations, including, but not limited to, the following:

- a) An Apple Macbook Pro, S/N NXM52AA0085051DDF57609;
- b) An Apple Mac Mini, S/N C07M60BXY3J;
- c) A Lenovo Thinkpad laptop, containing hard drive S/N SY930E4529;
- d) A 1TB LaCie external hard drive, S/N 86014a1c735200000000;
- e) A 1TB LaCie external hard drive, S/N WD-WMC130F6YF6S;
- f) A Freecom external hard drive, S/N 975702203000371; and

g) An SW Technology RAID array, S/N 99299Q3631-01.

A TRUE BILL

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

DATE

FOREPERSON

Dana J. Boente
United States Attorney

By: 

James E. Burke IV
Special Assistant United States Attorney (LT)
Nathaniel Smith III
Assistant United States Attorney